

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-00897

IN RE:	)	
	)	
CAMP LEJEUNE WATER LITIGATION	)	<b>JOINT MOTION FOR ADOPTION OF</b>
	)	<b>LITIGATION MANAGEMENT</b>
This Document Relates To:	)	<b>DATABASE</b>
ALL CASES	)	
	)	

Plaintiffs’ Lead and Co-Lead Counsel, together with Defendant United States (the “Parties”), jointly file this motion pursuant to Case Management Order No. 2, where the Court ordered “Plaintiffs’ Leadership and counsel for Defendant [to] meet and confer and propose to the Court a litigation-management database within 60 days from the entry of [that] Order.” (D.E. 23 at 13)

The Parties now jointly propose to the Court the adoption of Rubris, Inc.’s (“Rubris”) Crosslink application to serve as a litigation-management database for the Camp Lejeune Water Litigation, to keep track of items on the Court’s docket, including Short Form Complaints. Rubris is a technology and services company with significant experience building databases and providing related services to support the various needs of counsel, plaintiffs, administrators, and courts in complex litigation. The company comes highly recommended by several attorneys who have previously worked with the Rubris team and used the Rubris platform to perform complicated workflows in a single system. The Rubris team impressed members of Plaintiffs’ Leadership with their skill, responsiveness, and speed.

To ensure the efficient and orderly management of this complex litigation, it is important for all counsel representing Plaintiffs in the Camp Lejeune Water Litigation to use a single system to input information that will be submitted to the Court. In particular, it would facilitate the

efficient organization and analysis of information presented to the Court if all Plaintiffs' counsel used the Rubris Crosslink platform to populate, generate, and download Short Form Complaints before filing such complaints with the Court. This would ensure that all data presented to the Court in the complaints would be readily organized and analyzable by the Parties via the Crosslink platform.

The Parties therefore jointly request that the Court enter the attached proposed Order adopting the Rubris Crosslink platform as a litigation-management database for the Camp Lejeune Water Litigation and ordering counsel for all Plaintiffs in the litigation to use that platform to create the Short Form Complaint PDFs for filing. To do that, the Order would also require counsel for all Plaintiffs who intend to file a Short Form Complaint after the date of this order to create a Crosslink account and request access to Crosslink by emailing CrosslinkSupport@rubris.com, using the e-mail subject: "Camp Lejeune ECF and Form Management Crosslink Access." And the Order would require counsel to specify the name, law firm, and e-mail address of each individual requiring access to the Crosslink platform, along with the name of the attorney or firm representative who would serve as the administrator for the firm's account.

The Parties note that this motion applies only to the litigation-management database; other databases, including a global resolution database, will likely become necessary in the future, and such other databases may be created or serviced by separate third parties aside from Rubris.

DATED this 8th day of November 2023.

Respectfully submitted,

/s/ J. Edward Bell, III  
J. Edward Bell, III (admitted *pro hac vice*)  
Bell Legal Group, LLC  
219 Ridge St.  
Georgetown, SC 29440  
Telephone: (843) 546-2408

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN  
Director, Torts Branch

jeb@belllegalgroup.com  
*Lead Counsel for Plaintiffs*

/s/ Zina Bash  
Zina Bash (admitted *pro hac vice*)  
Keller Postman LLC  
111 Congress Avenue, Ste. 500  
Austin, TX 78701  
Telephone: 956-345-9462  
zina.bash@kellerpostman.com  
*Co-Lead Counsel for Plaintiffs*  
*and Government Liaison*

/s/ Robin Greenwald  
Robin L. Greenwald (admitted *pro hac vice*)  
Weitz & Luxenberg, P.C.  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5802  
rgreenwald@weitzlux.com  
*Co-Lead Counsel for Plaintiffs*

/s/ Elizabeth Cabraser  
Elizabeth Cabraser (admitted *pro hac vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, Suite 2900  
San Francisco, CA 94111  
Phone (415) 956-1000  
ecabraser@lchb.com  
*Co-Lead Counsel for Plaintiffs*

/s/ W. Michael Dowling  
W. Michael Dowling (NC Bar No. 42790)  
The Dowling Firm PLLC  
Post Office Box 27843  
Raleigh, North Carolina 27611  
Telephone: (919) 529-3351  
mike@dowlingfirm.com  
*Co-Lead Counsel for Plaintiffs*

/s/ James A. Roberts, III  
James A. Roberts, III (N.C. Bar No.: 10495)  
Lewis & Roberts, PLLC  
3700 Glenwood Avenue, Suite 410  
P. O. Box 17529

Environmental Torts Litigation Section

BRIDGET BAILEY LIPSCOMB  
Assistant Director, Torts Branch  
Environmental Torts Litigation Section

/s/ Adam Bain  
ADAM BAIN  
Senior Trial Counsel, Torts Branch  
Environmental Torts Litigation Section  
U.S. Department of Justice  
P.O. Box 340, Ben Franklin Station  
Washington, D.C. 20044  
E-mail: adam.bain@usdoj.gov  
Telephone: (202) 616-4209

LACRESHA A. JOHNSON  
HAROON ANWAR  
DANIEL C. EAGLES  
NATHAN J. BU  
Trial Attorneys, Torts Branch  
Environmental Torts Litigation Section  
*Counsel for Defendant United States of America*

Raleigh, NC 27619-7529  
Telephone: (919) 981-0191  
Fax: (919) 981-0199  
jar@lewis-roberts.com  
*Co-Lead Counsel for Plaintiffs*

/s/ Mona Lisa Wallace  
Mona Lisa Wallace (N.C. Bar No.: 009021)  
Wallace & Graham, P.A.  
525 North Main Street  
Salisbury, North Carolina 28144  
Tel: 704-633-5244  
*Co-Lead Counsel for Plaintiffs*

/s/ Hugh R. Overholt  
Hugh R. Overholt (NC Bar No. 016301)  
Ward and Smith P.A.  
Post Office Box 867  
New Bern, NC 28563-0867  
Telephone: (252) 672-5400  
hro@wardandsmith.com  
*Liaison Counsel for Plaintiffs*

/s/ A. Charles Ellis  
A. Charles Ellis (N.C. Bar No.: 010865)  
Ward and Smith P.A.  
Post Office Box 8088  
Greenville, NC 27835-8088  
Telephone: (252) 215-4000  
ace@wardandsmith.com  
*Liaison Counsel for Plaintiffs*